

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

JUSTIN BLAKE,

Plaintiff,

v.

Case No. 22-CV-970

DAVID BETH in his individual capacity and official capacity,
COUNTY OF KENOSHA a municipal corporation,
KYLE BISSONNETTE in his official capacity,
JACOB DICELLO in his official capacity,
GLORIA GALVAN in her official capacity,
DEREEMEYUN HAYNES in his official capacity
JEREMY MAY in his official capacity,
JOHN DOE OFFICERS in the Kenosha County Sheriff's Department 1-10,
WISCONSIN COUNTY MUTUAL INSURANCE COMPANY, and
ABC INSURANCE COMPANY,

Defendants.

DEFENDANTS, DAVID G. BETH, COUNTY OF KENOSHA, KYLE BISSONNETTE, JACOB DICELLO, GLORIA GALVAN, DEREEMEYUN HAYNES AND JEREMY MAY'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS TO PRODUCE

To: Justin Blake
c/o Mr. Nathaniel Cade, Jr.
Cade Law LLC
P. O. Box 170887
Milwaukee, WI 53217
--Attorneys for Plaintiff

Defendants, David G. Beth, County of Kenosha, Kyle Bissonnette, Jacob DiCello, Gloria Galvan, Dereemeyun Haynes and Jeremy May, by their attorneys, Crivello Carlson, S.C., and for

their Response to Justin Blake's First Set of Interrogatories and Requests to Produce, dated November 12, 2022, state as follows:

INTERROGATORIES

INTERROGATORY NO. 1: If any of your responses to any above-listed request to Admit was not an unqualified admission, for each response please:

- (a) State each and every fact which support or rebuts your denial of the statement set forth in each Requests to Admit;
- (b) Identify each and every person with the knowledge that supports or rebuts your denial of the statement set forth in each Request to Admit and separately state the facts known by each person(s); and
- (c) Identify each and every document which supports or rebuts your denial of the statement set forth in each Request to Admit.

RESPONSE:

Request No. 4: **Blake's name and identification was requested at the time of his arrest. Individuals with knowledge regarding same include Deputy Kyle Bissonnette and Sergeant Jeremy May. Documents regarding same include enclosed Bates numbered documents Blake, Justin v. Kenosha County 000010-012. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.**

Request No. 5: **At the time Blake was arrested, his identity was unknown. It was later believed that the subject may have been Blake, but he refused to confirm his identification. Individuals with knowledge regarding same include Deputy Kyle**

Bissonnette, Sergeant Jeremy May, Deputy Allison George, Deputy Brian Koschnitzke, Deputy Julia Mancl, Lieutenant Neil Paulsen, Sergeant Michael Pittsley, Correctional Officer Dereemeyum Haynes, Correctional Officer Jacob P. DiCello, Correctional Officer Gloria E. Galvan, and Sergeant Brian M. Doe. Documents regarding same include enclosed Bates numbered documents Blake, Justin v. Kenosha County 000002-004, 008-012, 016-017, 026-027, 079-080. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

Request No. 6: Blake was arrested for disorderly conduct and obstructing/resisting an officer. Individuals with knowledge regarding same include Deputy Allison George, Deputy Kyle Bissonnette, Deputy Brian Koschnitzke, and Sergeant Michael Pittsley. Documents regarding same include enclosed Bates numbered documents Blake, Justin v. Kenosha County 000003-017, 019, 021. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

Request No. 8: Placing Blake in the ERC on April 25, 2021, at or around 11:09 pm was not against the Jail's policies. Individuals with knowledge regarding same include all individually named defendants. Documents regarding same include enclosed Bates numbered documents Blake, Justin v. Kenosha County 073-077, 081-156. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

Request No. 9: Placing Blake in the ERC on April 25, 2021, at or around 11:09 pm was not against the County's policies. Individuals with knowledge regarding same

include all individually named defendants. Documents regarding same include enclosed Bates numbered documents Blake, Justin v. Kenosha County 073-077, 081-156. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 2: Identify the person(s) responding to these Interrogatories on Your behalf and identify each person who has provided information in connection with these Interrogatories, and for each person identified, please provide their name, phone number, and last known address.

RESPONSE: Attorneys for these answering defendants in conjunction with various County employees. These answering defendants reserve the right to amend and/or supplement this response as soon as all responsive documents are collected.

INTERROGATORY NO. 3: Identify all facts that provide the basis for your Affirmative Defense Number 2.

RESPONSE: These answering defendants object to interrogatory no. 3 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 4: Identify all facts that provide the basis for your Affirmative Defense Number 3.

RESPONSE: These answering defendants object to interrogatory no. 4 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 5: Identify all facts that provide the basis for your Affirmative Defense Number 4.

RESPONSE: These answering defendants object to interrogatory no. 5 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 6: Identify all facts that provide the basis for your Affirmative Defense Number 5.

RESPONSE: These answering defendants object to interrogatory no. 6 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 7: Identify all facts that provide the basis for your Affirmative Defense Number 6.

RESPONSE: These answering defendants object to interrogatory no. 7 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 8: Identify all facts that provide the basis for your Affirmative Defense Number 7.

RESPONSE: These answering defendants object to interrogatory no. 8 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 9: Identify all facts that provide the basis for your Affirmative Defense Number 8.

RESPONSE: These answering defendants object to interrogatory no. 9 on the basis that it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. These answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 10: Identify all Sheriff deputies or employees that were on duty or working for the Department between 8:00 a.m. on April 25, 2021 and 10:00 a.m. on

April 26, 2021, and for each such person identified, identify the person(s)'s current rank, position or title with the Department, how long the person(s)'s has worked for the Department, whether that person(s) is currently employed by the Department, and if not currently employed, the person(s)'s last known address and telephone number.

RESPONSE:

Andrew Abbott

Mr. Abbott is currently a Correctional Officer and has been employed by Kenosha County since 2017.

Kaelan Aker

Mr. Aker is currently a Correctional Officer and has been employed by Kenosha County since 2020.

Rachael Bellaire

Ms. Bellaire is currently a Social Worker with Kenosha County.

Bryan Bernhardt

Mr. Molinaro is currently a Correctional Officer and has been employed by Kenosha County since 1993.

Deputy Kyle Bissonnette

Mr. Bissonnette is currently a Deputy Sheriff and has been employed by KCSD since 2018.

Shawn Bogdala

Mr. Bogdala is currently a Correctional Officer and has been employed by Kenosha County since 2017.

James Bosas

Mr. Bosas is currently a Correctional Officer and has been employed by Kenosha County since 2018.

Billy Cameron

Mr. Cameron is currently a Correctional Officer and has been employed by Kenosha County since 1997.

Thomas Corrao

Mr. Corrao is a former Correctional Officer and was employed by Kenosha County from June 17, 1996, through November 15, 2021. Mr. Corrao's last known contact information is:

**3309 30th Street
Kenosha, WI 53144
(262) 960-6332**

Scott Dahl

Mr. Dahl is currently a Correctional Officer and has been employed by Kenosha County since 2001.

Brian Doe

Mr. Doe is currently a Correctional Officer and has been employed by Kenosha County since 2004.

Jacob P. DiCello

Mr. DiCello is currently a Correctional Officer and has been employed by Kenosha County since 2018.

Zaide Estrada

Ms. Estrada is currently a Correctional Officer and has been employed by Kenosha County since 2020.

Joseph Fazzari

Mr. Fazzari is a former Correctional Officer and was employed by Kenosha County from May 14, 2013, through June 5, 2021. Mr. Fazzari's last known contact information is:

**1817 104th Street
Pleasant Prairie, WI 53158
(262) 989-0515**

Gloria E. Galvan

Ms. Galvan is currently a Correctional Officer and has been employed by Kenosha County since 2018.

Deputy Allison George

Ms. George is currently a Deputy Sheriff and has been employed by KCSD since 2017.

Dereeemeyun M. Haynes

Mr. Haynes is currently a Correctional Officer and has been employed by Kenosha County since 2014.

Monica Hoff

Ms. Hoff is currently a Correctional Officer and has been employed by Kenosha County since 2004.

Michael Holterman

Mr. Holterman is currently a Correctional Officer and has been employed by Kenosha County since 2017.

Melissa Ishee

Ms. Ishee is currently a Correctional Officer and has been employed by Kenosha County since 2013.

Denise Jarvela

Ms. Jarvela is currently a Correctional Officer and has been employed by Kenosha County since 1998.

Nathan Knautz

Mr. Knautz is currently a Correctional Officer and has been employed by Kenosha County since 2007.

Craig Knecht

Mr. Molinaro is currently a Correctional Officer and has been employed by Kenosha County since 2009.

Stephanie Kohnke

Ms. Kohnke is a former Correctional Officer and was employed by Kenosha County from June 13, 2017, through October 24, 2021. Ms. Kohnke's last known contact information is:

**12715 254th Court
Trevor, WI 53179
(262) 716-1108**

Deputy Brian Koschnitzke

Mr. Koschnitzke is currently a Deputy Sheriff and has been employed by KCSD County since 2019.

Sergeant Kenneth Krenz

Mr. Krenz is currently a Sergeant for KCSD.

Chad Loesch

Mr. Molinaro is currently a Correctional Officer and has been employed by Kenosha County since 2019.

Dirk MacDonald

Mr. Naef is currently a Correctional Corporal and has been employed by Kenosha County since 1998.

Deputy Julia Mancl

Ms. Mancl is currently a Deputy Sheriff and has been employed by KCSD County since 2019.

Sergeant Ryan J. Markowski

Mr. Markowski is currently a Sergeant with KCSD.

Pablo Martini

Mr. Martini is a former Correctional Corporal and was employed by Kenosha County from January 5, 2020, through September 10, 2022. Ms. Martini's last known contact information is:

**6412 54th Avenue
Kenosha, WI 53142
(262) 344-3259**

Sergeant Jeremy May

Mr. May is currently a Correctional Sergeant and has been employed by KCSD since 2019.

Cory McDannel

Mr. McDannel is a former Correctional Officer and was employed by Kenosha County from November 27, 2017, through September 22, 2022. Mr. McDannel's last known contact information is:

**514 English Street
Racine, WI 53402
(262) 939-9965**

Anthony Molinaro

Mr. Molinaro is currently a Correctional Officer and has been employed by Kenosha County since 1999.

Rhonda Moore

Ms. Moore is currently a Correctional Officer and has been employed by Kenosha County since 2019.

Daniel Naef

Mr. Naef is currently a Correctional Officer and has been employed by Kenosha County since 1996.

Lieutenant Neil Paulsen

Mr. Paulsen is currently a Lieutenant/Facility Administrator and has been employed by KCSD since 2019.

James Parker

Mr. Parker is currently a Correctional Officer and has been employed by Kenosha County since 2008.

Sergeant Michael Pittsley

Mr. Pittsley is currently a Sergeant and has been employed by KCSD since 2017.

Jeremy Presichel

Mr. Presichel is currently a Correctional Officer and has been employed by Kenosha County since 2019.

Francisco Santos

Mr. Santos is a former Correctional Officer and was employed by Kenosha County from January 6, 2020, through August 17, 2021. Mr. Santos' last known contact information is:

6504 39th Avenue
Kenosha, WI 53142
(509) 869-9562

Janetta Sepanski

Ms. Sepanski is currently a Correctional Officer and has been employed by Kenosha County since 2000.

Franklin Shelby

Mr. Shelby is a former Correctional Officer and was employed by Kenosha County from August 31, 2016, through July 1, 2021. Mr. Shelby's last known contact information is:

23617 80th Place
Kenosha, WI 53168
(262) 891-2794

Debra Shimkus

Ms. Shimkus is a former Correctional Officer and was employed by Kenosha County from March 16, 2021, through November 1, 2022. Ms. Shimkus's last known contact information is:

11008 67th Place
Kenosha, WI 53142
(262) 948-9833

Heather Smith

Ms. Smith is a former Correctional Officer and was employed by Kenosha County from November 29, 2016, through September 9, 2022. Ms. Smith's last known contact information is:

425 Holy Hill Road #11
Twin Lakes, WI 53181
(262) 729-6033

Deputy Christopher Schneider

Mr. Schneider is currently a Deputy Sheriff with KCSD.

Lieutenant Kenneth D. Urquhart

Mr. Urquhart is currently a Lieutenant with KCSD.

Zacharias Walden

Mr. Walden is a former Recruit Officer and was employed by Kenosha County from April 12, 2021, through April 29, 2021. Mr. Walden's last known contact information is:

26519 Lilac Lane
Wind Lake, WI 53185
(262) 332-0941

Heidi Wenburg

Ms. Wenburg is a former Correctional Officer and was employed by Kenosha County from April 24, 2007, through July 30, 2022. Ms. Wenburg's last known contact information is:

**2714 Northbridge Drive
Racine, WI 53404
(262) 945-8548**

Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 11: Identify the person(s) who placed Blake in the Chair, and if not included in response to Interrogatory No. 10, identify that person(s)'s current rank, position or title with the Department, how long the person(s)'s has worked for the Department, whether that person(s) is currently employed by the Department, and if not currently employed, the person(s)'s last known address and telephone number.

RESPONSE: Individuals involved with placing Blake in the ERC include Sergeant May, Correctional Officer Dereemeyun Haynes, Correctional Officer Jacob DiCello, and Correctional Officer Gloria Galvan. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 12: Identify all Department policies with respect to use of or placement in the Chair, arresting of protesters of any kind on or near County property, and requirements that suspects provide You their name or identification.

RESPONSE: Please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 073-077, 081-156. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 13: If an investigation was conducted as to how Blake was injured, please identify all such person(s) who conducted the investigation, and for each such person(s), please identify such person(s)'s current rank, position or title with the Department, how long the person(s)'s has worked for the Department, whether that person(s) is currently employed by the Department, and if not currently employed, the person(s)'s last known address and telephone number.

RESPONSE: These answering defendants object to interrogatory no. 13 on the basis it assumes facts not in evidence. Particularly, these answering defendants object to the use of the term "injured," and deny that Mr. Blake suffered any injury while incarcerated at the Kenosha County Jail during the subject time frame. These answering defendants further object on the basis this request seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 14: If you contend that Blake was not injured in the Chair, please identify all factual bases for such a contention.

RESPONSE: These answering defendants object to interrogatory no. 14 on the basis it assumes facts not in evidence. Particularly, these answering defendants object to the use of the term "injured," and deny that Mr. Blake suffered any injury while incarcerated at the Kenosha County Jail during the subject time frame. These answering defendants further object on the basis this request seeks information protected by the Work Product doctrine. These answering defendants further object on the basis that this

request is premature in nature and discovery is ongoing. These answering defendants reserve the right to supplement and/or amend this response.

INTERROGATORY NO. 15: Identify any statement(s) that You contend Blake made about his arrest or his injuries.

RESPONSE: These answering defendants object to interrogatory no. 15 on the basis it assumes facts not in evidence. Particularly, these answering defendants object to the use of the term “injuries,” and deny that Mr. Blake suffered any injury while incarcerated at the Kenosha County Jail during the subject time frame. The answering defendants further object on the basis that this request is premature in nature and discovery is ongoing. Subject to and without waiving said objections, the Defendants are aware Mr. Blake spoke with many media outlets regarding the subject arrest and detention. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

INTERROGATORY NO. 16: Identify any statement(s) that You contend any other witness made about their arrest or injuries regarding the allegations in the Complaint, Justin Blake or about Jacob Blake.

RESPONSE: These answering defendants object to interrogatory no. 16 on the basis it assumes facts not in evidence. Particularly, these answering defendants object to the use of the term “injuries,” and deny that Mr. Blake suffered any injury while incarcerated at the Kenosha County Jail during the subject time frame. The answering defendants further objection the basis it is vague as to time, overbroad as to subject matter, and not

reasonably calculated to lead to discoverable information. These answering defendants further object on the basis it is premature in nature. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Produce all documents that You reviewed in order to answer the Plaintiffs First Set of Request to Admit, Interrogatives, or Request to Produce to You.

RESPONSE: These answering defendants object to request no. 1 on the basis it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. Subject to and without waiving said objections, please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 000001-156. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

REQUEST NO. 2: Produce all emails, notes, reports, memorandums, files, and any other documents in your possession that relates in any way to Blake's arrest on April 25, 2021.

RESPONSE: These answering defendants object to request no. 2 on the basis it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. Subject to and without waiving said objections, please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 000001-156. Discovery remains ongoing and these answering Defendants reserve the right to amend and/or supplement this response.

REQUEST NO. 3: For every person identified in Interrogatories No. 10 and 11, please produce a complete and unredacted employment file for said person(s).

RESPONSE: These answering defendants object to request no. 3 on the basis that it seeks private information; namely, the medical history of non-party individuals. Subject to and without waiving said objections, employment files have been requested and, any such files that are discoverable, will be provided to Plaintiff's counsel upon receipt.

REQUEST NO. 4: Produce all of the Department's policies that were in place between April 25, 2021, and April 26, 2021, including any policies with regards to use of the Chair.

RESPONSE: These answering defendants object to request no. 4 that it is overbroad and unlikely to lead to discoverable information. Subject to and without waiving said objections, please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 073-077, 081-156. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement their response.

REQUEST NO. 5: Produce all documents in your possession from the investigation of Blake's arrest.

RESPONSE: These answering defendants object to request no. 5 on the basis it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. Subject to and without waiving said objections, please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 000001-156. Discovery remains

ongoing and these answering defendants reserve the right to amend and/or supplement their response.

REQUEST NO. 6: Produce all documents regarding Blake's arrest, including booking materials, probable cause statements.

RESPONSE: These answering defendants object to request no. 6 on the basis it seeks information protected by the Work Product doctrine and/or Attorney-Client privilege. Subject to and without waiving said objections, please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 000001-156. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement their response.

REQUEST NO. 7: Produce all communications or documents provided to or shared with the Kenosha County District Attorney's Office regarding Blake's arrest.

RESPONSE: These answering defendants object to request no. 7 to the extent it seeks any communication covered by the Work Product doctrine and/or Attorney Client privilege. Communications with or documents provided to or shared with the Kenosha County District Attorney's Office have been requested and any such documents that are discoverable will be provided to Plaintiff's counsel upon receipt.

REQUEST NO. 8: Produce all notes of interviews that You performed of employees, agents, inmates, deputies and other personnel with respect to Blake's arrest on April 25, 2021.

RESPONSE: These answering defendants object to request no. 8 on the basis it seeks information protected by the Work Product doctrine and/or Attorney-Client

privilege. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

REQUEST NO. 9: Produce all insurance policies that would provide insurance as to the allegations contained in the Complaint.

RESPONSE: Plaintiff's have previously been provided with a copy of Kenosha County's Wisconsin Municipal Mutual Insurance Company Policy.

REQUEST NO. 10: Produce all documents pertaining to the Chair that the Department received from the manufacturer of the Chair.

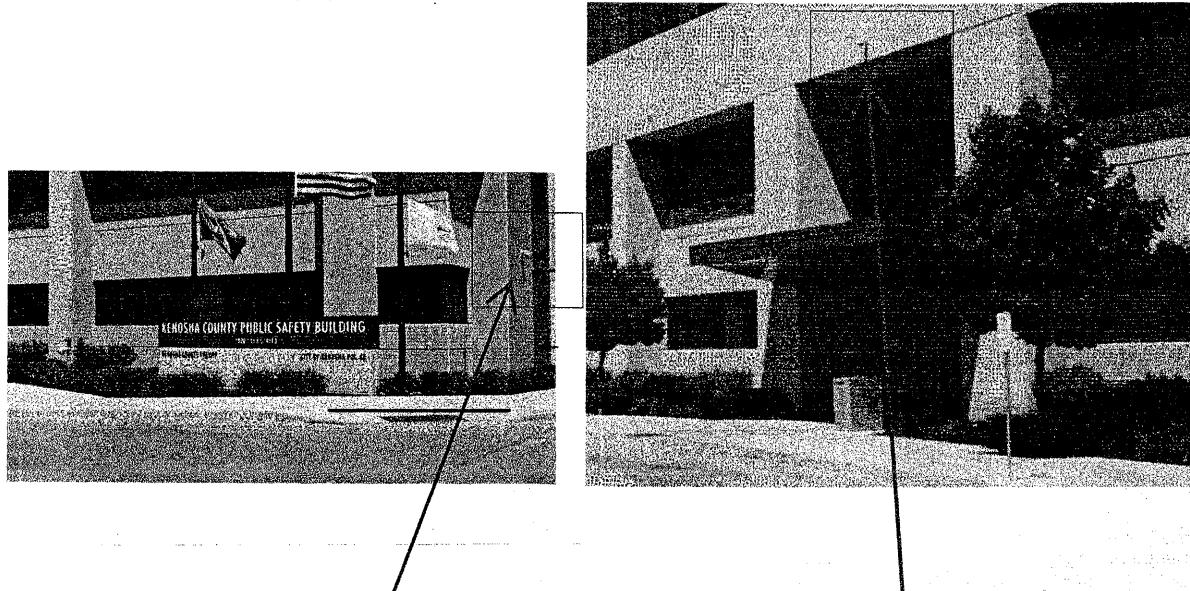
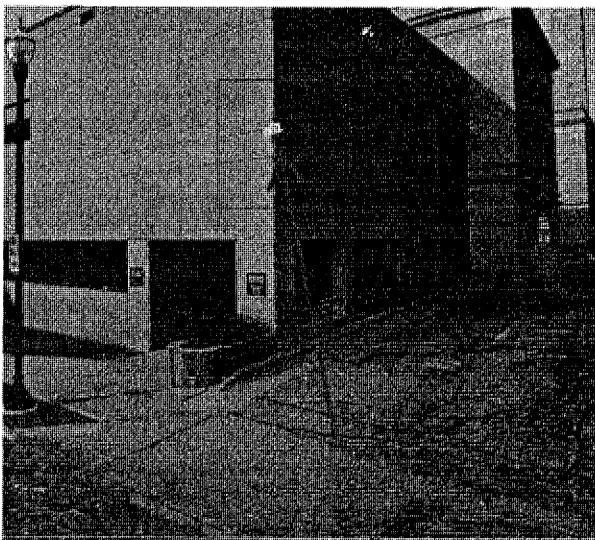
RESPONSE: Please see enclosed Bates numbered documents Blake, Justin v. Kenosha County 000028-096. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

REQUEST NO. 11: Produce all videos or photographs of any scene inside the Kenosha County Public Safety Building located at 1000 55th Street, Kenosha, Wisconsin from 8:00 a.m. on April 25, 2021 and 10:00 a.m. on April 26, 2021, including any videos or photos of inside the Kenosha Sheriff's Department or where the Chair is located.

RESPONSE: These answering defendants object to request no. 11 on the basis it is overbroad as to time. Subject to and without waiving said objection, these videos will be sent to you on a thumb drive labeled Ex. A. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

REQUEST NO. 12: Produce all videos or photographs of any scene outside the Kenosha County Public Safety Building located at 1000 55th Street, Kenosha, Wisconsin from

8:00 a.m. on April 25, 2021, and 10:00 a.m. on April 26, 2021, including those as identified in these photographs:



RESPONSE: These answering defendants object to request no. 11 on the basis it is overbroad as to time. Subject to and without waiving said objection, these videos will be

sent to you on a thumb drive labeled Ex. B. Discovery remains ongoing and these answering defendants reserve the right to amend and/or supplement this response.

Dated this _____ day of _____, 2022.

By: _____
REPRESENTATIVE FOR COUNTY
DEFENDANTS

As to objections:

Dated this 12 day of December, 2022.

By:


SAMUEL C. HALL, JR.

State Bar No. 1045476

STEVEN C. MCGAVER

State Bar No. 1051898

BRIANNA J. MEYER

State Bar No. 1098293

Attorneys for Defendants, David G. Beth,
County of Kenosha, Kyle Bissonnette, Jacob
DiCello, Gloria Galvan, Dereemeyun Haynes
and Jeremy May

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